

1 JAMES V. FAZIO III (SBN: 183353)  
jfazio@grsm.com  
2 ALISON M. PRINGLE (SBN: 319995)  
aprangle@grsm.com  
3 GORDON REES SCULLY MANSUKHANI, LLP  
4 633 West Fifth Street, 52<sup>nd</sup> Floor  
Los Angeles, CA 90071  
5 Telephone: (213) 576-5000  
Facsimile: (619) 696-7124

6 Attorneys for Defendant BELLEVILLE SENATORS,  
7 INC. (ERRONEOUSLY SUED AS CAPITAL  
SPORTS AND ENTERTAINMENT, INC.)  
8

9 IN THE UNITED STATES DISTRICT COURT  
10 FOR THE CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

11  
12 ASSOCIATED PRODUCTION MUSIC  
LLC, a New York limited liability  
13 company,

14 Plaintiff,

15 v.

16 AMERICAN HOCKEY LEAGUE, a  
Massachusetts nonprofit corporation;  
17 UTICA COMETS, LLC, a New York  
limited liability company; HERSHEY  
18 ENTERTAINMENT & RESORTS  
COMPANY, a Pennsylvania corporation;  
19 ONTARIO REIGN HOCKEY CLUB,  
LLC, a Delaware limited liability  
20 company; SYRACUSE HOCKEY  
OWNERSHIP TEAM, LP, a New York  
21 limited partnership; ICEARIZONA AHL  
CO LLC, a Delaware limited liability  
22 company; LARIMER COUNTRY  
SPORTS, LLC, doing business as  
23 Colorado Eagles Pro Hockey, a Colorado  
limited liability company; CAVALIERS  
24 OPERATING COMPANY, LLC, a  
Delaware limited liability company;  
25 CHICAGO BLACKHAWK HOCKEY  
TEAM, INC. a Delaware corporation;  
26 CAPITAL SPORTS &  
ENTERTAINMENT INC., a Delaware  
27 corporation; and DOES 1-10, inclusive,

28 Defendants.

Case No. 2:24-CV-07803-RGK-AJR

**DEFENDANT BELLEVILLE  
SENATORS INC.'S NOTICE OF  
MOTION AND MOTION TO  
DISMISS PLAINTIFF'S  
COMPLAINT FOR LACK OF  
JURISDICTION [FRCP 12(B)(2)],  
IMPROPER VENUE [FRCP  
12(B)(3)] AND FORUM NON  
CONVENIENS**

*Filed concurrently with  
Memorandum of Points and  
Authorities, Declaration of Erin  
Crowe, and [Proposed] Order*

Judge: Hon. R. Gary Klausner  
Hearing Date: December 30, 2024  
Time: 9:00 a.m.  
Place: Ctrm 850  
Complaint Filed: September 12, 2024

**TO THIS HONORABLE COURT, ALL PARTIES, AND THEIR  
ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE THAT on December 30, 2024, at 9:00 a.m., or as soon thereafter as this matter may be heard in Courtroom 850 before the Honorable R. Gary Klausner of the above-entitled Court, located at 255 East Temple Street, Los Angeles, CA, 90012, Defendant Belleville Senators Inc. (erroneously sued as Capital Sports & Entertainment, Inc.) (the “Senators”), will and hereby does move this Court for an order dismissing Plaintiff Associated Production Music, LLC (“APM”)’s Complaint pursuant to Federal Rules of Civil Procedure 12(b)(2), 12(b)(3) and the doctrine of *forum non conveniens*.<sup>1</sup>

The Motion to Dismiss provides the following bases for dismissing the instant action with prejudice: (i) the Court lacks personal jurisdiction over the Senators; (ii) the United States District Court for the Central District of California is an inappropriate venue; and (iii) the doctrine of *forum non conveniens* applies and favors trial of this matter in Canada.

This Motion is based on this Notice, the accompanying Memorandum of Points and Authorities and the Declaration and Exhibits attached thereto, all pleadings and documents on file in this matter, and on such other and further evidence or argument as may be presented at or before the hearing on this matter.

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<sup>1</sup> The Senators note this Court’s November 21, 2024 ECF docket entry states that the Senators “shall have up to and including December 27, 2024, to respond to the Complaint in this matter.” Dkt. 42. This created confusion where the text of the Court’s Order, which the Senators discovered November 26, 2024, provides that the extension for the Senators was only granted to November 25, 2024. No prejudice results from this one-day delay.

1 This Motion is made following the conference of counsel under L.R. 3-7,  
2 which took place on November 19, 2024.

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4 Dated: November 26, 2024

Respectfully Submitted,

5 GORDON REES SCULLY  
6 MANSUKHANI, LLP

7  
8 By: /s/ James V. Fazio III

James V. Fazio III  
Alison M. Pringle  
Attorneys for Defendant  
Belleville Senators, Inc. (erroneously  
sued as Capital Sports &  
Entertainment, Inc.)

GORDON REES SCULLY MANSUKHANI, LLP  
633 West Fifth Street, 52nd Floor  
Los Angeles, CA 90071